DAVID A. ROSENFELD, Bar No. 058163 CAROLINE N. COHEN, Bar No. 278154 WEINBERG, ROGER & ROSENFELD A Professional Corporation 1001 Marina Village Parkway, Suite 200 Alameda, California 94501 Telephone (510) 337-1001 Fax (510) 337-1023

E-Mail: drosenfeld@unioncounsel.net ccohen@unioncounsel.net

Attorneys for Charging Party INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, DISTRICT COUNCIL 16

UNITED STATES OF AMERICA

NATIONAL LABOR RELATIONS BOARD

REGION 20

DELTA SANDBLASTING COMPANY, INC.,

Case No. 20-CA-176434 32-CA-180490

Respondent,

ANSWER TO EXCEPTIONS TO **DECISION OF THE** ADMINISTRATIVE LAW JUDGE

and

INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, DISTRICT COUNCIL 16,

Charging Party.

International Union of Painters and Allied Trades, District Council 16 ("Union"), as Charging Party, agrees and joins with the analysis and argument as set forth in the Answering brief of counsel for the General Counsel. The Union in addition provides additional briefing regarding its accompanying cross-exceptions.

Dated: November 21, 2017 WEINBERG, ROGER & ROSENFELD A Professional Corporation

/s/ Caroline N. Cohen

By:

DAVID A. ROSENFELD CAROLINE N. COHEN

Attorneys for Charging Party INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES. **DISTRICT COUNCIL 16**

141339\943490

PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On November 21, 2017, I served the following documents in the manner described below:

ANSWER TO EXCEPTIONS TO DECISION OF THE ADMINISTRATIVE LAW JUDGE

☐ (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from lhull@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

Mr. Gary Shinners National Labor Relations Board Executive Secretary 1015 Half Street SE Washington, D.C. 20570-0001 (202) 273-3737 General (202) 273-0086 Fax

Via Electronic Filing

Alan S. Levins, Esq.
Paul Goatley, Esq.
Littler Mendelson, P. C.
333 Bush Street, 34th Floor
San Francisco, CA 94104-2842
alevins@littler.com
pgoatley@littler.com

Attorneys for Employer, Delta Sandblasting Company, Inc.

Ms. Cecily Vix
National Labor Relations Board, Region 20
901 Market Street, Suite 400
San Francisco, CA 94103-1738
(415) 356-5156 (fax)
Cecily.Vix@nlrb.gov

Attorney for the National Labor Relations Board

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 21, 2017, at Alameda, California.

/s/ Karen Kempler
Karen Kempler